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## *SHAPE UP AMERICA!*

August 17, 2005

Chief, Regulations and Procedures Division  
Alcohol and Tobacco Tax and Trade Bureau  
Attn: Notice No. 41  
P.O. Box 14412  
Washington, DC 20044-4412

Re: Notice No. 41

Dear Sir or Madam:

Shape Up America! is a non-profit organization whose mission is to encourage a better diet in all individuals and healthy weight loss in overweight individuals that can be sustained over time. As president of Shape Up America!, I am writing this letter to urge TTB to require a mandatory "Alcohol Facts" panel on the labels of all alcoholic beverages, regardless of product category.

For many people, alcohol is a significant source of calories. At a time when this country is facing an unprecedented epidemic of obesity, providing information about the alcohol content and number of calories in all beverage alcohol products will be an important way to help Americans achieve and maintain a healthy body weight. Factual information about calories and alcohol content is critically needed at the point of purchase so it can inform consumers' purchasing decisions. For many consumers, alcohol-containing beverages often are consumed immediately after purchase in restaurants and bars, so this information must be on the label if it is to guide consumers' consumption decisions in this context. For others, consumption may occur in the home at a later time, but this information remains vitally important to guide consumption decisions in the home environment.

A recent FDA report, *Calories Count*, reinforces a message that Shape Up America! has focused on for the past decade, namely, that counting calories and balancing energy consumed against energy expended is the key to maintaining a healthy weight. Awareness of the caloric content of food and beverages is essential to implementing this energy balance strategy. Accordingly, Shape Up America! urges TTB to require labeling on all beverage alcohol products that lists the number of calories per serving. This information would make it possible for consumers to estimate the number of calories they

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are consuming and, with this information, adhere to the *Dietary Guidelines*' advice on maintaining weight within a healthy range.

At the same time, Shape Up America! proposes that the "Alcohol Facts" panel contain this additional information in a standardized format:

- The serving size (*i.e.*, 12 fluid ounces (fl oz) for beer, 5 fl oz for wine, and 1.5 fl oz for distilled spirits);
- The amount of alcohol (in fluid ounces per serving);
- The percentage alcohol by volume;
- The definition of a "standard drink";
- The number of standard drinks per container; and
- A summary of the recommendation contained in *The Dietary Guidelines for Americans 2005*, which defines moderate drinking as no more than 2 drinks per day for men and one drink per day for women.

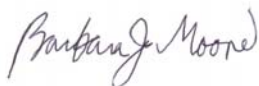
Regarding information about the fat, carbohydrate, and protein content of beverage alcohol products, Shape Up America! believes that these facts should be provided on government websites, such as the USDA, FDA and TTB websites. The exception would be if the product makes a carb claim (*e.g.*, "low carb"), in which case we believe that carbohydrate information should be required. Shape Up America! also urges TTB to require ingredient and allergen labeling of all alcoholic beverages.

Recognizing that this rulemaking is likely to take years to complete, Shape Up America! believes that consumers need alcohol content, calorie, and allergen information immediately. For this reason, we request that TTB issue an interim policy allowing bottlers to voluntarily provide this information on their labels now. Despite concerns raised by TTB, we do not believe that having access to this information will confuse consumers. Indeed, for weight management, this information is even more valuable to the public than the carb content information that TTB now allows through an interim policy.

In summary, Shape Up America! urges TTB to require an "Alcohol Facts" panel on the labels of all beverage alcohol products and in the interim, to allow voluntary labeling that includes alcohol, calorie, and allergen information. Access to this information is long overdue and will significantly advance important public health goals.

Thank you for your consideration.

Sincerely,



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